



October 23, 2024

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**VIA ECF**

Hon. Sidney Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: *The Center for Investigative Reporting, Inc. v. OpenAI Inc., et al.* No. 24-cv-04872 – Motion to File Excess Pages**

Dear Judge Stein:

I represent Plaintiff The Center for Investigative Reporting, Inc. (“CIR”) in this matter. On October 15, 2024, the OpenAI Defendants and Defendant Microsoft filed separate motions to dismiss the First Amended Complaint. Under the Court’s September 25, 2024 order, CIR’s response is due November 5, 2024. *See* ECF No. 89.

I write to respectfully seek leave to file a combined opposition to Defendants’ motions to dismiss, not to exceed 35 pages, in lieu of separate responses to each motion. Some of Defendants’ arguments overlap, and it would be more convenient for the Court and the parties for CIR to respond in one place. At the same time, additional space is required for CIR to address arguments made by OpenAI but not Microsoft, and vice-versa.

Counsel for the parties have conferred, and Defendants do not oppose this motion.

Thank you for your consideration.

Respectfully submitted,

*/s/ Stephen Stich Match*  
Stephen Stich Match (No. 5567854)  
LOEVY & LOEVY  
*Counsel for Plaintiff*

cc: All counsel of record (via ECF)